

Hazardous Waste Rule Amendments

Training
Dec. 2, 2015

Hazardous Waste Rule Amendments

- Regulation changes were prompted by passage of Section 260.373.1 Revised Statutes of the State of Missouri
- New rules effective Dec. 30, 2015

Container Labeling

Applies to all

- Containers must be marked with the words “Hazardous Waste”
- Containers must be marked with the beginning date of accumulation
- If less than one gallon, the generator may label the locker, rack or other device used to hold or accumulate any such container

Container Labeling

Option 1

Additional requirements

- Containers must be labeled per US Department of Transportation (US DOT) during the entire time the waste is accumulated on-site



Container Labeling


Option 2 Additional requirements

- Clearly label container with words that correctly identify the hazards of the contents of the container during the entire on-site storage period (Ignitable, Toxic, Corrosive or Reactive)
- The label shall be white with black lettering or black with white lettering that is a minimum of one inch in height

Tank Labeling - NEW

- Hazardous waste generator tanks must comply with NFPA Standard 704 labeling
 - **NFPA 704** - a system for identifying the specific hazards of a material and the severity of the hazard that would occur during an emergency response
- Hazard evaluation should be performed by persons who are competent and experienced in the NFPA 704 standard

704 label information

Label Type	Purpose	Typical Label Location	Label Example
NFPA 704 Diamond www.nfpa.org/704	Provides information about hazards that occur during emergency response	Outside buildings, on doors, on tanks, visible to emergency responders during spill or fire	 <p>The image shows a standard NFPA 704 hazard diamond. It is a diamond shape divided into four colored triangles: red (top), blue (left), yellow (right), and white (bottom). The red triangle contains the number '2', the blue triangle contains the number '3', the yellow triangle contains the number '1', and the white triangle contains a hazard symbol (a stylized 'W' with a horizontal line through it).</p>

Satellite Accumulation (SA) Regulations

- Two options available
- Will default to Federal interpretation if facility has not submitted a notification to use Missouri interpretation
- Choose one to incorporate facility wide

Always applicable SA requirements

- Containers at or near the point of generation and under the control of the operator
- Containers in good condition
- Waste compatible with the containers
- Closed, except when adding/removing waste
- Marked with the words “Hazardous Waste” or other words identifying the contents
- Containers must be dated once the volume/time limits are reached

SA Options

Option One (default): Follow the Federal interpretation

- Limited to 55 gallons total of hazardous waste accumulation from all waste streams
- Allows for multiple containers in a SA
- Excess volume must be shipped/moved to storage within three calendar days

SA Options

Option Two:

- Submit updated Notification of Regulated Waste Activity (NORWA) form and renotify if decision changes
- One container per waste stream up to 55 gallons
- Accumulation time limit of one year or until container is full (whichever occurs first)
- Date of accumulation on each satellite container
- Container must be shipped/moved to storage within three calendar days once volume/time limit is reached




MISSOURI
DEPARTMENT OF
NATURAL RESOURCES

VII. TYPE OF REGULATED WASTE ACTIVITY (ONLY MARK THE FOLLOWING SECTIONS THAT APPLY)

A. Hazardous Waste Activities

1. Generator of hazardous waste (Choose only one of the following four categories.)

- ☐ a. LQG: Greater than 1,000kg (2,220 lbs.) of non-acute hazardous waste or 1kg (2.2 lbs.) of acute hazardous waste in a calendar month.
- ☐ b. SQG: Generate 100 to 1,000kg (220-2,220 lbs.) of non-acute hazardous waste at any one time.
- ☐ c. CESQG: Generate less than 100kg (220 lbs.) of hazardous waste in a calendar month and never accumulate 100kg (220 lbs.) or more of hazardous waste at any one time.
- ☐ d. Not a generator. Generate no hazardous waste at any time.
- ☐ e. Episodic LQG event (see instructions)
Date of Episodic Event ____/____/____
-  ☐ f. Missouri Satellite Accumulation Opt-In (see instructions)

In addition, indicate other generator activities.

- ☐ g. United States importer of hazardous waste.
- ☐ h. Mixed waste (hazardous and radioactive) generator.

For Items 2 through 8, check all boxes that apply.

- ☐ 2. Transporter of hazardous waste.
- ☐ a. Transporter.
- ☐ b. Transfer Facility (at your site).

B. Universal Waste Activities

1. Large quantity handler of universal waste (accumulate 5,000kg or more). [Refer to Missouri regulations to determine what is regulated.] Indicate types of universal waste managed or accumulated at your site. Check all boxes that apply.

MANAGE

- a. Batteries ☐
- b. Lamps ☐
- c. Pesticides ☐
- d. Thermostats ☐

☐ **2. Destination facility for universal waste. Note: A hazardous waste permit may be required for this activity.**

C. Used Oil Activities (Check all boxes that apply)

1. Used oil transporter – Indicate types of activities.

- ☐ a. Transporter
- ☐ b. Transfer facility

2. Used oil processor or re-refiner – Indicate types of activities.

- ☐ a. Processor
- ☐ b. Re-refiner

Other changes

- Used oil released into the environment that can be recycled remains used oil

Waste codes for dioxin and used oil

- Dioxin - Restores federal hazardous waste definitions, exclusions and management standards for 2,4,5-T & 2,3,7,8-TCDD
- Used Oil – Removes the Missouri specific waste code for used oil that is disposed rather than recycled (D098)

Other significant changes

- Elimination of Missouri-specific requirements for secondary containment upon accumulation of 1000 kg of liquid hazardous waste and associated inspections
- No longer requires a contingency plan or personnel training plan for generators that **accumulate** 1000 kg in a calendar month
- Removes Missouri's additional requirements for "No Smoking" signage in storage areas

Other significant changes

- Removes requirement for daily inspections of areas subject to spills
- Removes prohibition on storage of less than 6000 kg of ignitable or reactive waste less than 50 ft from the property line
- Removes Missouri specific manifest exception reporting requirements

Moving forward

- New webpage now available with newsletter and other guidance
<http://dnr.mo.gov/env/hwp/enf/ruleupdate.htm>
- Now preparing new checklists and factsheets
- Will discuss changes with facility managers during inspections

QUESTIONS ?

Contact us

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